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Arizona Corporation Commission

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**IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

**AT&T'S VERIFIED REPLY TO
QWEST'S SURREPLY ON AT&T'S
MOTION TO REOPEN AND
SUPPLEMENT THE RECORD ON
CHECKLIST ITEM 7 (911)**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix
(collectively "AT&T"), hereby file their Verified Reply To Qwest's Surreply On
AT&T's Motion to Reopen and Supplement the Record on Qwest Corporation's
(formerly US West) Compliance With Checklist Item Number 7 of Section 271 of the
Telecommunications Act of 1996 ("Act"). Kenneth L. Wilson has verified the
information contained in this Reply as set forth in the Verification annexed hereto. Mr.
Wilson has been the affiant for AT&T's previous filings on the 911 database issue.

I. INTRODUCTION

Qwest and AT&T have traded data and disputed each other's claims in the series
of filings surrounding the 911 database updating issue. Although AT&T has provided
data based on its records from the outset, it has become clear that many of the numbers
AT&T originally claimed Qwest had failed to unlock in a timely manner remained locked
through no fault of Qwest's. However, Qwest was and is responsible for failing to

unlock hundreds of numbers, thereby depriving AT&T of the ability to update the 911 database. As Qwest has acknowledged, the accuracy of the 911 database is very important¹ and the problems that have repeatedly resulted in Qwest's failure to unlock the 911 database must be fully corrected.

It appears that at least some of the data problems arise from Qwest's providing data as of a date that is days or weeks after the date on which AT&T conducted its research. It is not surprising that in the intervening period between the time AT&T provides information about improperly locked numbers to Qwest and the time Qwest files its response, the data change to reflect less of a problem than AT&T had stated. The reason is simple: Qwest now is working very hard, as it should have all along, to correct the problems AT&T has identified. Although Qwest is acting commendably in correcting the problems AT&T identifies, there should never be a need to present these problems to the Commission in order to achieve resolution. Another reason for the apparent discrepancies in some of the data, is Qwest's misunderstanding of a "winback" situation that AT&T discusses in greater detail below.

To the extent discrepancies continue to exist, a data reconciliation should occur. AT&T made this request in its Reply brief filed on March 4, 2002 ("AT&T's Reply").² As explained from the outset, the data AT&T provided has been based on its own records. If Qwest's or Intrado's (the company that administers the 911 database for Qwest) records indicate that AT&T's records are incorrect, the best way to resolve the problem is through a reconciliation. Trading data through affidavits and verified pleadings is an inefficient and unproductive way to resolve these issues.

¹ See Qwest's Surreply To AT&T's Reply On Its Motion To Reopen And Supplement The Record On Checklist Item 7, dated March 11, 2002 ("Qwest's Surreply") at 4.

² See AT&T's Reply at 1-2.

Specific data disputes aside, the record is clear that there has been a problem updating the E911 database. Qwest as well as competitive local exchange carriers ("CLECs") must act to ensure that the information in the 911 database is correct. Qwest's proposed solution is a good interim step. However, as AT&T has explained and will reiterate below, it is an inadequate long-term solution. Only after a long-term solution is adopted, implemented and tested will Qwest be in compliance with Section 271. Therefore, the Commission should reopen checklist Item 7 and find that Qwest is in noncompliance until Qwest has resolved the 911 database problem.

II. DISCUSISON

In Qwest's Surreply it provides the results of its analysis of the data AT&T submitted in confidential Exhibits B, C and D annexed to the Affidavit of Kenneth L. Wilson, dated March 4, 2002. With respect to Exhibit D, Qwest is correct that approximately 616 of the 1142 unique numbers AT&T provided as having been improperly locked by Qwest were locked by other carriers.³ However, with respect to 200 numbers that Qwest claims have not been ported to AT&T as of March 6, 2002, it is possible that some of those numbers *were* ported to AT&T, but Qwest has since won the customers back. Thus, AT&T's contention that Qwest had failed to unlock some or even all of those numbers properly may still be correct. AT&T has not verified Qwest's claims with respect to those 200 numbers or the other approximately 30 numbers that Qwest identified in Exhibit D. The fact remains, however, that *at least*, by Qwest's own admission, 292 numbers in Exhibit D were ported to AT&T from Qwest. Given that Exhibit D is not a comprehensive list of all the 911 database problems AT&T encountered in 2001 and given the win back situation, that number is likely higher. The 911 database problem is real and it is significant.

As for AT&T Exhibits B and C, AT&T *never* contended that all of the listed error codes were caused by Qwest. Rather, AT&T explained that for the numbers listed in Exhibit B it had received a 755 error code (the code Intrado sends during the first fourteen days a number remains locked) and that some of those were the result of Qwest's failing to properly send the unlock message to Intrado. Qwest's argument that 147 of the 156 records in Exhibit B are now locked to TCG (as they should be)⁴ provides little assurance that the problem has been solved. That 147 numbers are now locked to TCG only shows that between the time AT&T filed its Reply brief and the date Qwest filed its Surreply, the problems with those numbers have been solved. To the extent those problems were caused by Qwest, there is no evidence that Qwest sent the unlock message to Intrado in a timely manner initially.

With respect to the 108 numbers in AT&T Exhibit C, AT&T received the more serious 760 error code from Intrado. Qwest's arguments relating to Exhibit C show only that past problems with the numbers have been resolved. Again, there is no evidence that any effective long-term solution is in place. Assuming that Qwest is correct that any failure to unlock 77 of the 108 numbers is not Qwest's fault, nothing in the record shows that Qwest was not responsible for causing the 760 error codes for the remaining 31 numbers. Qwest's statement that these 31 numbers are now locked to TCG,⁵ if accurate, only shows that the problem causing the 760 error code has been resolved since AT&T filed its Reply brief. The resolution of the problem for each of these numbers could well have been Qwest's finally sending the unlock message to Intrado.

The one fact that remains unchanged despite these discrepancies is that there is a problem with CLECs' ability to update the 911 database for LNP customers. Qwest's

³ See Qwest Surreply at 6.

⁴ Qwest Surreply at 7.

implementation of its "solution" on February 25, 2002, by adopting the NENA standards and working with Intrado to develop and implement a solution only substantiates AT&T's claim that Qwest's previous method for unlocking numbers in the 911 database was inadequate.

On March 4, 2002, in an effort to address the difficulty AT&T has experienced unlocking certain numbers, AT&T sent Intrado 6,839 numbers for which Intrado had sent AT&T 760 error codes. These are numbers from Qwest's entire territory. Contrary to Qwest's claim in some jurisdictions, AT&T was not merely load testing the new Intrado clean-up process. AT&T has been actively working these numbers for unlock problems, some of them for months.

AT&T began receiving reports from Intrado on the status of 911 database updates for these numbers on March 5, 2002. The report on March 5th shows that Intrado updated the 911 database for 38 numbers for AT&T. On March 6th, the report shows that Intrado updated 1,038 numbers for AT&T. Intrado was using the new process and had started working the 6,839 orders. Qwest had failed to unlock many of these numbers. The March 6th report from Intrado also shows an additional 1,862 numbers that remained locked by Qwest. Over the course of the next week, Intrado unlocked additional numbers. By March 13th, only 369 numbers remained locked to Qwest. Approximately 2,000 numbers that Qwest had failed to unlock, in the Qwest region, were unlocked by Intrado in the space of a week.⁶

In its Surreply, Qwest makes some confusing comments about the numbers that were submitted by AT&T and processed by Intrado. Qwest appears to suggest that the

⁵ Qwest Surreply at 7.

⁶ Of the 6,839 numbers AT&T sent to Intrado on March 5th, approximately 3,500 were locked to carriers other than Qwest. Given that this problem affects many carriers, AT&T urges the Arizona commission to

complete universe of numbers AT&T submitted to Intrado are referred to in Qwest Exhibit 1. This is incorrect. Qwest's Exhibit 1 refers only to about 1477 numbers, not all of the 6,839 that AT&T submitted. Qwest is correct, however, in its statement that TCG told Intrado that for those numbers in Exhibit 1 it did not require an unlock message. The reason TCG no longer needed the unlock message is that Qwest had won those customers back. All of these numbers had been ported to AT&T, but were ported back to Qwest before the unlock issue was resolved. The fact remains that Qwest failed to properly unlock these numbers when they were originally ported to AT&T. If Qwest had unlocked them, then, when the numbers were ported back to Qwest, AT&T would have been required to unlock the 911 database for Qwest. Since Qwest never unlocked them in the first place and then won back the customers, AT&T properly agreed that it no longer needed these numbers unlocked. This was only a subset of the total numbers that had unlock problems.

AT&T recognizes the value in the NENA process that Qwest implemented on February 25th as a short-term solution. However, there is no assurance that Intrado will continue to clean-up unlock problems that Qwest causes. The problem is not small, despite Qwest's claims to the contrary. There must be definitive contract language in the SGAT that binds Qwest and Intrado to the current process of cleaning up 911 unlock issues. Moreover, the Intrado clean-up process introduces delay in the updating of the 911 database. Qwest has failed to identify, much less fix, the root cause of their failure to unlock numbers. This necessitates the large number of records that Intrado must clean-up. DB-1 and DB-2 should be modified to track Qwest's performance in allowing CLECs to modify data in the 911 database. DB-1 should have a subpart that measures

require all other carriers to subscribe to this process. AT&T already has agreed to use the Intrado clean-up process to unlock numbers when appropriate.

facilities-based CLECs' ability to update the 911 database in a timely manner. Intrado can provide data on the number of records that had to be cleaned up by the new process and the average time that this process takes. If the electronic update by Qwest for its retail customers is 15 seconds and the average time it takes for a CLEC record is much longer, due to the additional manual processing, then that should be recorded. This is technically feasible and would add little to Intrado's processes to record the necessary information.

The Intrado clean-up process has not been tested over even a short period, much less a period of months, to see if it catches all errors. Qwest's assertion that the Intrado process will correct all *initial* failures to unlock the 911 database is unproven. Some testing should be done to assure that the new process is working. Further, there should be metrics to assure that the process works in the future. DB-2 measures errors in updating databases. If the new Intrado clean-up process fails to unlock numbers that should be unlocked, then the CLEC will receive 755 and 760 error messages. These errors are currently not being recorded in DB-2. Qwest should be required to make 755 and 760 error messages part of DB-2. Mistakes CLECs make that cause 755 or 760 error messages can be filtered out of the metric, giving a true indication of the problems that remain.

III. CONCLUSION

For all the foregoing reasons, the Commission should grant AT&T's Motion to Recopen and Supplement the Record, review Qwest's compliance with checklist item number 7 and modify metrics DB-1 and DB-2.

Dated this 18th day of March 2002.

**AT&T COMMUNICATIONS
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CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Verified Reply to Qwest's Surreply on AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (911)**, Docket No. T-00000A-97-0238, were sent by overnight delivery on March 18, 2002 to:

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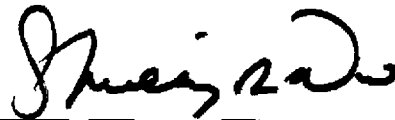
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